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EPA Region 5 Records Ctr.



365812

August 31, 2007

Ms. Jennifer Hale Weyerhaeuser Company P.O. Box 9777 Mail Stop WTC-2G2 Federal Way, WA 98063-9777

Subject: 12th Street Landfill – Emergency Action

Status Update Report

#### Dear Jennifer:

This letter presents activities performed as part of the 12th Street Landfill Emergency Action in Plainwell, Michigan, between August 17 and August 30, 2007. Heavy rain over this period has slowed some of the field work, but should not have an adverse impact on the overall schedule at this time. Field activities performed during this period include the following:

- The east face of the landfill has been reshaped to a 5:1 slope with any residual material being relocated to the containment pad on top of the landfill. Minimal residuals were identified in the face of the landfill. Material with no visual residuals was stockpiled and will be used to cover the pad areas if necessary.
- Two areas along the edge of the east face had visual residual areas and were covered with temporary tarps until the material can be moved back into the landfill.
- The Portadam structures were installed upstream and downstream of the landfill. The curtain material could not be placed due to the increase in flow of the Kalamazoo River. The flow rates have increased from 475 cfs on August 17 to over 1,000 cfs by August 24.
- Equipment delivered to the site included the Portadams, pump for water removal from channel, manhole to be used as sump within channel, and diversion structure for water removal.
- Sampling stations were installed within the river to monitor turbidity during construction operations. The stations operated over a 3-day period to determine a background turbidity level.
- Stone was delivered to the site and roads within the landfill were regarded and strengthened with the stone as a base material.

If you have any questions regarding RMT's services, please contact me at 262-879-1212.

Sincerely,

RMT, Inc.

James L. Hutchens Sr. Project Manager

cmk/enclosures

# Weyerhaeuser Emergency Response Actions Status Update

## Submit approvable Multi-Area QAPP and Field Sampling Plan

QAPP approved July 24, 2007. FSP approved August 3, 2007. Addendum for former Plainwell Mill Emergency Action submitted on September 10, 2007, and approved on October 31, 2007.

## 12th Street Landfill Emergency Action

Design Report submitted on July 27, 2007, and conditionally approved on August 15, 2007. Removal work started September 6, 2007. Major work completed November 7, 2007.

### **Objectives**

Remove visual paper residuals from the channel before the main flow of the Kalamazoo River is re-routed.

Install a final erosion protection system along the former powerhouse channel west bank that meets the requirements of the existing Record of Decision (ROD).

Construct these systems in a manner compatible with the specified landfill closure requirements in the 2002 ROD.

### Status

Removed residuals identified during RMT investigation in July 2007. Approximately 600 yards of residuals were removed from the channel and placed in the 12th Street Landfill.

Cut back eastern landfill slope to 5H:1V, created hydraulic separation with compacted clay layer, and placed vegetation and erosion control as required by the ROD to an elevation of 702.5 feet. Final site restoration will be completed in the spring of 2008.

All components of the Emergency Action were designed to be consistent with the ROD and compliment the expedited schedule of the planned 12th Street Landfill Remedial Design/Remedial Action.

### Former Plainwell Mill Banks Emergency Action

Design Report submitted on September 5, 2007, and conditionally approved on October 31, 2007. Removal work started November 13, 2007. Major work completed March 31, 2008.

### **Objectives**

Remove or contain visible paper residuals and address previously identified areas of reported PCBs concentrations of greater than 50 mg/kg in soils/sediments along the former Plainwell Mill banks to a target concentration of either 4 mg/kg or 1 mg/kg.

Reconstruct bank, as needed, to minimize future release of PCBs.

Reconfigure bank to limit upland cutbacks into former Plainwell Mill property and place erosion controls to provide comparable stability to pre-excavation conditions.

#### Status

Removed visible residuals from 2200 lineal feet along Zones A, B, C and D to target concentrations and riverbed. Two areas of the site (150 feet [Zone D] and 230 feet [Zone C]) were capped with sand and clay prior to erosion control stone placement as an interim measure to cover exposed sediments that were higher than the target concentration. This area will potentially be readdressed following further investigation in this area.

Bank reconstruction required in Zone A. Clean fill material was place to create an approximate 3H:1V slope.

Upland cutbacks were minimized unless visual residuals were evident. Erosion protection was placed in all zones as specified in the design report.

	2005	Jan Jun. 2006	Jul Dec. 2006	January - March 2007	April – June 2007	July - September 2007	Oct Dec. 2007	January - March 2008	April – June 2008	July – Forward 2008
12th Street Landfill RD/RA	2005: Spring: QMP submittal, review, and approval Summer: Inundation Work	Inundation Study							Prepare RD Work Plan  Mar. 23 <sup>rd</sup> : Submit RD Work  Plan  Received Comments from RD  Work Plan	
Plainwell Mill RI/FS & RD/RA	Mar. 05: Final Reuse Assessment Prepared by E2 Aug. 05: Meeting on Schedule for Mill RI/FS Dec. 05: 1st Draft SOW from USEPA	Discussions with     City regarding     Integrated Approach     Began SOW     Review     Meetings with City     and planner funded     by Weyerhaeuser	Aug. 15 <sup>th</sup> : SOW is Final Sept. 30 <sup>th</sup> : Submit RI/ FS Workplan	Developer's Forum Jan. 31 <sup>st</sup>	May 22 <sup>nd</sup> : Formal request from City for continued work on the integrated process.  Jun. 18 <sup>th</sup> : Letter from City and Weyerhaeuser to EPA on Integrated Approach	Aug. 9 <sup>th</sup> : Meet with City on Concept Plan for Plainwell Mill	Nov. 13 <sup>th</sup> : City update meeting on Mill Redevelopment Dec. 7 <sup>th</sup> : City and USEPA Meeting	Mar. 4 <sup>th</sup> : Submittal of Plainwell Mill Work Plan Addendum #1 Mar. 11 <sup>th</sup> : City update meeting on Mill Redevelopment Mar. 21 <sup>th</sup> : Comments on Plainwell Mill Work Plan Addendum from USEPA Mar. 28 <sup>th</sup> : Comment response letter sent to USEPA		
Former Powerhouse Channel Emergency Action				Reviewed scope of TCRA and impact on OU4     Conference Call to USEPA (Mar. 23 <sup>rd</sup> ) Tim Prendiville PM for Landfill	May 8 <sup>th</sup> : USEPA Meeting on TCRA Issues (Michael Berhoff PM for Landfill)  Jun. 6 <sup>th</sup> : USEPA Meeting on TCRA Issues  May 14 <sup>th</sup> : Letter request for Emergency Action  May 17 <sup>th</sup> : Approval of Geotech scope and DQOs	July 24 <sup>th</sup> : Conditional Multi-Area QAPP Approval July 27 <sup>th</sup> : Design Report Submittal Aug. 3 <sup>rd</sup> : Final QAPP Responses Sent Aug. 1s <sup>tt</sup> : USEPA Approval of Emergency Action Aug. 3 <sup>rd</sup> : Conditional Approval of Work Plan and FSP Aug. 13 <sup>th</sup> : Initiated Site Preparation Activities Aug. 15 <sup>th</sup> : Conditional Approval of Powerhouse Channel Design Report Sept. 6 <sup>th</sup> : Began Excavation of Channel Sept. 7 <sup>th</sup> : Submitted final text of Design Report	Oct. 2 <sup>nd</sup> – Site Mtg and County Mtg.  Oct. 3 <sup>rd</sup> – USEPA Mtg.  Dec. 7 <sup>th</sup> – USEPA Mtg.  Nov. 7 <sup>th</sup> : Completed Fall 2007 Emergency Action Tasks	Site Temporarily Closed	Next Steps: Finalize site restoration activities as soon as weather permits.  Prepare and complete documentation report.	
Plainwell Mill Banks Emergency Action				Reviewed Scope of TCRA and Impact on Mill Banks     Initial Request by City to Address Banks	May 22 <sup>nd</sup> : Formal request by City to Address Banks  Jun. 6 <sup>th</sup> : USEPA Mtg.  Jun. 28 <sup>th</sup> : Emergency Action Request Letter  Jun. 29 <sup>th</sup> : USEPA Approval of Emergency Action Response	July 16 <sup>th</sup> : Bank Reconnaissance Work Plan Conditionally Approved  July 17 <sup>th</sup> – 20 <sup>th</sup> : Field Work: 35 Hand Augers, 12 Sediment Cores, and 12 Borings  Aug. 14 <sup>th</sup> : Submitted Conceptual Design for Emergency Action Along Banks  Aug. 22 <sup>nd</sup> : Submitted Final Revisions for Bank Reconnaissance  Sept 5 <sup>th</sup> : Submitted Design Report  Sept. 11 <sup>th</sup> : Received comments on Conceptual Design Report  Sept. 17 <sup>th</sup> : Requested Approval of Site Preparation Activities	Responses to USEPA Comments Dated: Oct. 16 <sup>th</sup> , 17 <sup>th</sup> , 22 <sup>nd</sup> , and 25 <sup>th</sup> Oct. 16 <sup>th</sup> : Initiate Site Prep. Oct. 31 <sup>st</sup> : USEPA Conditional Approval of Design Report  Nov. 13 <sup>th</sup> : Approve field work and initiate bank excavations  Dec. 12 <sup>th</sup> : Zone A Completed	Jan. 2 <sup>nd</sup> : Work Restarted  Jan. 14 <sup>th</sup> : Zone B Completed  Mar. 6 <sup>th</sup> : Zone D Completed  Mar. 31 <sup>st</sup> : Zone C Completed	Apr. 1st: Start preparation for off-site transport and disposal  Next Steps:  Complete off site disposal  Complete site Restoration  Prepare documentation report	Finalize Documentation Report

Note: Consent Decree Entered on 2/15/05

PROJECT: WEYERHAEUSER COMPANY
KALAMAZOO RIVER SUPERFUND SITE

SHEET TITLE: 12<sup>TH</sup> STREET LANDFILL AND
PLAINWELL MILL BANKS
PROJECT SUMMARY 2006 TO 2008

DATE: APRIL 2008

DRAWN BY: NCW

FIGURE 1

